## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

AARON T. DANIELS (a/k/a "HARUN MUHAMMAD") and (a/k/a "ABU YUSUF"),

Defendant.

CASE NO. 2:16-cr-222

**CHIEF JUDGE SARGUS** 

**UNDER SEAL** 

## GOVERNMENT'S UNOPPOSED MOTION TO EXTEND DEADLINES RELATED TO THE PRESENTENCE REPORT

Now comes the United States and hereby moves this Court to extend the deadlines for the submission of objections to the initial Presentence Investigative Report (PSR) and the ultimate disclosure of the final PSR. The government requests that the deadline for objections to the initial PSR be extended an additional 45 days, or until November 30, 2017 and that disclosure of the final PSR be extended until December 21, 2017. A memorandum in support of this motion is attached.

Respectfully submitted,

BENJAMIN C. GLASSMAN UNITED STATES ATTORNEY

/s Jessica W. Knight

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## **MEMORANDUM IN SUPPORT OF MOTION**

Objections to the initial PSR are due to the United States Probation Department by October 16, 2017. The final PSR is due to the Court by November 6, 2017. On August 10, 2017, the United States filed a motion under seal for a Presentence Examination of Defendant (Doc. #47). The pending motion requests that the Court order a psychological evaluation in order to provide information to the parties and the Court regarding issues of the Defendant's capacity and mental health. The Court has indicated that it will grant the United States' motion. To that end, the parties provided the Court with documents for the psychologist on September 27, 2017 and suggested language for a letter on October 11, 2017.

Thus, the government requests additional time to allow for the psychological examination of Defendant, for the findings of that examination to be incorporated into the presentence report, and to allow the parties time to consider and object to those findings if appropriate.

The Probation Department and defense counsel do not oppose this motion.

WHEREFORE, the United States respectfully requests that this motion be granted and the deadline for objections to the initial PSR be extended 45 days, or until November 30, 2017 and that final disclosure of the final PSR be extended until December 21, 2017.

Respectfully submitted,

BENJAMIN C. GLASSMAN UNITED STATES ATTORNEY

/s Jessica W. Knight

JESSICA W. KNIGHT (0086615)

Assistant United States Attorney

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**CERTIFICATE OF SERVICE** 

I hereby certify that a copy of the foregoing government's unopposed motion to continue deadline to submit final presentence report was served this 12th day of October 2017, electronically on all counsel of record.

s/Jessica W. Knight

JESSICA W. KNIGHT (0086615)

**Assistant United States Attorney**